

Changes Made to Rule 3.14 and 3.19 as a Result of the Public Workshop:

- The District has amended both Rule 3.14 and 3.19 to extend the sell through provision to July 31st, 2017.
 - Rule 3.14 - Amended Section D.3: The Prohibition of Sale or Manufacture has been extended from December 31, 2016 to July 31, 2017.
 - Rule 3.19 - Amended Section D.3.a: The Prohibition of Sale or Manufacture has been extended from December 31, 2016 to July 31, 2017.
- Changes to the Sales Records Recordkeeping Requirements in Rule 3.19.
 - Amended Section E.3.d: 'Business name, street address, phone number, and either business license or driver's license' will only be applicable to the coatings sold to businesses.
 - Amended Sections E.3.a, E.3.b, and E.3.c will be applicable to all types of sales.
 - A record of the driver's license is not needed if selling to individuals.
 - A business license or a driver's license is needed if selling to businesses.

Response to Questions Asked at Rule 3.14 & 3.19 Public Workshop:

- **Can you clarify the requirements for painting agricultural equipment?**
 - *Painting agricultural equipment can occur in three different ways -.*
 - *Painting at an Original Equipment Manufacturing Plant: As per Section A.4.d, the provisions of Rule 3.19 shall not apply to any coating applied to motor vehicles or mobile equipment, or their associated parts and components, during manufacture on an assembly line.*
 - *Assembly Line is defined as: An arrangement of industrial equipment and workers such as an Original Equipment Manufacturing Plant in which the product passes from one specialized operation to another until complete, by either automatic or manual means.*
 - *An Individual Painting their Own Agricultural Equipment: A District Permit will not be required; however, the provisions of Rule 3.19 such as painting with compliant coatings shall apply.*

- *A Business/Company painting Agricultural Equipment: A District Permit will be required, and the provisions of Rule 3.19 such as painting with compliant coatings shall apply.*
- **What liability do I have as an auto body shop for coatings applied by other people, either at my shop or off-site? For example, if I prep a motorcycle and then send it off-site for pin-stripping, then the motorcycle comes back to my shop for clear-coating. Am I responsible for knowing the pin-stripping paint is compliant? What if they do pin-stripping at my shop?**
 - *A facility is not subject for any coatings that are applied off-site. A facility is only subject if the coatings are applied at the facility.*
 - *Small Quantity Exemption: The provisions of Rule 3.19 shall not apply to any automotive coating that is sold, supplied, or offered for sale in 0.5 fluid ounce or smaller containers intended to be used by the general public to repair tiny surface imperfections.*
 - *Application Methods Exemption: The provisions of Section C.3 of Rule 3.19 shall not apply to the application of underbody coatings, graphic design applications, truck bed liner coatings, or any coating use of less than one (1) fluid ounce (29.6 milliliters).*
- **Are any grants available to assist sellers with transition costs?**
 - *The District is not aware of any available grants.*
 - *Low interest loans may be available from CPCDFA (<http://www.treasurer.ca.gov/cpcfa/>)*
- **For an automotive coatings seller that custom fills aerosol cans, would this be allowed after the passage of the amendments to Rule 3.19?**
 - *The manufacture or repackaging of automotive coatings is an allowable activity subject to the provisions of the rule. The details of paint formulations and allowable VOC levels is a technical issue best discussed on a case by case basis. If a facility has a specific question or process that they want the District to evaluate, the facility can submit an Authority to Construct application or schedule a time to meet with the District regarding their process.*